

August 30, 2019

**Via ECF**

Honorable Ramon E. Reyes, Jr.  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Emmanuel Augustin v. American Airlines, Inc.*  
**Docket No.: 18-CV-01484 (LDH)(RER)**

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Dear Magistrate Judge Reyes:

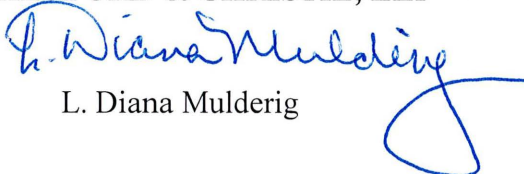
As your Honor is aware, we represent the defendant American Airlines, Inc. ("American Airlines") in the above referenced matter. Please allow the following to serve as a request for a short extension of the fact discovery deadline to September 20, 2019. The plaintiff has consented to this request.

As your Honor may recall, the current discovery deadline in this case is September 3, 2019. The parties have been working diligently to conduct discovery and will have completed all of the parties' depositions by the current deadline. The extension of the deadline is requested by the defendant so that it may conduct the non-party deposition of the plaintiff's wife, Ms. Augustin, who is a direct witness to the events raised in the complaint. Upon information and belief, Ms. Augustin resides in Maryland and due to Holidays, vacation schedules and other unforeseen circumstances, the first mutually convenient date for all parties to conduct Ms. Augustin's deposition is September 20, 2019. It is respectfully submitted that the extension will not prejudice the plaintiff in this case.

Thank you for your consideration of this request.

Respectfully submitted,

**RUTHERFORD & CHRISTIE, LLP**

  
L. Diana Mulderig

cc. **Via ECF**  
Kreindler & Kreindler, LLP